

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region II

**Subject:** POLREP #11  
RV1  
Tonawanda Coke Corporation  
0201601  
Tonawanda, NY

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**From:** Thomas Budroe, OSC

**Date:** 10/28/2018

**Reporting Period:** 10/28/2018

1. Introduction

1.1 Background

<b>Site Number:</b>	A28U	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	10/17/2018	<b>Start Date:</b>	10/17/2018
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	NYD088413877	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	Yes
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility

shutdown.

### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

During a Saturday - Sunday, October 27 - 28, 2018, transition period the Tonawanda Coke Corp. (TCC) permanently vacated the Site. All boiler and other operations necessary to treat the contaminated aqueous waste streams stored/generated on-site are being conducted by former TCC employees which EPA's ERRS contractor is now employing. A former TCC electrician shall also begin working for EPA's ERRS contractor on-site on Monday, October 29, 2018. An ERRS foreman is working the night shift to supervise operations. A private security firm has been subcontracted to provide Site security.

ERRS currently has a pending account for electric service with National Grid. ERRS has set up an account for gas transmission with National Fuel and is in the process of setting up an account with Chaupauqua Energy Management, Inc. for the natural gas supply. An account for water and sewer service are still pending since the current account for the Site is in arrears and Town of Tonawanda is requiring that the arrears be paid before an account can be set up with ERRS. ORC and DOJ are working on this issue. Until the issue is settled water and sewer service shall continue.

The pump supporting the Ammonia Still system successfully ran all night at 30 gallons per minute (gpm). At 6:00 AM the pump rate was increased to 35 gpm and at 9:00 AM was increased to 40 gpm.

The weak ammonia liquor can only be treated from the north weak ammonia tank. Due to the pipes corroding and leaking, TCC had removed all piping servicing the south weak ammonia liquor tank where the majority of the weak ammonia liquor is stored. Materials are being acquired to plumb a temporary means to transfer the weak ammonia liquor to the north tank. This procedure will be done in aliquots since a large portion of the same line must also be used for other purposes.

The boiler instruments are powered by compressed air. Due to mechanical and electrical issues the two main compressors have not been running. The system has been powered by two smaller and very antiquated backup compressors which can marginally service the boiler. EPA directed ERRS to deliver a rental compressor for use to provide a reliable backup compressor until the electrical/mechanical problems with the main compressors are resolved.

#### 2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

1. Continuing operating the boiler and supporting systems.
2. Continue running the Ammonia Still System to treat the weak ammonia liquor and other generated aqueous waste.
3. Continue to pump the contaminated water from the containment and sump areas for treatment in the Ammonia Still System.
4. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
5. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
6. Continue to maintain and monitor both the plant process water and the surface storm water systems
7. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
8. Clean and subsequently remove the plant process containment areas.

#### 2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

#### 2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

## 2.3 Logistics Section

No information available at this time.

## 2.4 Finance Section

### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$550,000.00	\$0.00	\$550,000.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$550,000.00</b>	<b>\$0.00</b>	<b>\$550,000.00</b>	<b>100.00%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

No information available at this time.

## 3. Participating Entities

### 3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

## 4. Personnel On Site

One OSCs, nine ERRS personnel and two RST3 personnel.

## 5. Definition of Terms

No information available at this time.

## 6. Additional sources of information

## 7. Situational Reference Materials

No information available at this time.